

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)	
)	
Petitioner,)	Misc. No. 06-10427 PBS
)	
v.)	
)	
JEFFREY SHIELDS,)	
(Reg. No. 10760-036),)	
)	
Respondent.)	
UNITED STATES OF AMERICA,)	
)	
Petitioner,)	Misc. No. 06-10439 PBS
)	
v.)	
)	
JOEL WETMORE,)	
(Reg. No. 10379-036),)	
)	
Respondent.)	
UNITED STATES OF AMERICA,)	
)	
Petitioner,)	Misc. No. 06-10449 PBS
)	
v.)	
)	
CHARLES PEAVY,)	
(Reg. No. 24545-050),)	
)	
Respondent.)	

ASSENTED-TO MOTION FOR EXTENSION OF TIME

Petitioner, the United States of America, hereby requests an extension of time of one and one-half days, through June 29, 2007, at 12:00 p.m., in which to file its opposition to the

consolidated motion to dismiss by respondents Jeffrey Shields, Joel Wetmore, and Charles Peavy. Counsel for respondents has assented to this motion. In further support thereof, the United States says as follows:

1. On May 16, 2007, respondents filed a consolidated motion to dismiss in these three actions, raising facial constitutional challenges to section 302(4) of the Adam Walsh Child Protection and Safety Act, Pub. L. No. 109-248, Title III, 302(4), 120 Stat. 620 (July 27, 2006), codified at 18 U.S.C. §4248(a).

2. On June 13, 2007, the parties filed a Stipulation Re: Briefing Schedule and Assented-to Motion for Leave to File Excess Pages, which provided that the government's opposition of the shall be due on or before June 27, 2007; and that respondent's reply brief shall be due on or before July 20, 2007. On June 18, 2007, this Court allowed the motion.

3. The government needs a short extension of time in which to complete its opposition memorandum, and requests that an extension of one and one-half days, or through June 29, 2007, at 12:00 p.m., in which to file that opposition. Counsel for the respondents, William Fick, Esq., has assented to this motion.

WHEREFORE, with good cause having been shown, the government respectfully request that this Court grant them an extension of time of one and one-half days, or until June 29, at 12:00 p.m., in which to file its consolidated opposition to the respondents' motion to dismiss.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Mark T. Quinlivan
MARK T. QUINLIVAN
Assistant U.S. Attorney
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3606

Dated: June 27, 2007

LOCAL RULE 7.1(a)(2) CERTIFICATE

Pursuant to Local Rule 7.1(a)(2), I certify that I have conferred with William Fick, Esq., co-counsel for the respondents, regarding this motion, and that Mr. Fick has assented thereto.

/s/ Mark T. Quinlivan
MARK T. QUINLIVAN
Assistant U.S. Attorney